

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT WINCHESTER

FILED
FEB 23 2021
Clerk, U. S. District Court
Eastern District of Tennessee
At Chattanooga

UNITED STATES OF AMERICA)
)
v.)
)
JOHN EUGENE COLLINS, Jr.,)
JENNIFER ANN KELNHOFER,)
also known as Jennifer Ann Gurien,)
JOSHUA A. KELNHOFER)
and)
JEFFREY P. KYER)

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INDICTMENT

COUNT ONE

The Grand Jury charges that from in or about April 2020, to in or about July, 2020, in the Eastern District of Tennessee, the defendants, JOHN EUGENE COLLINS, Jr., JENNIFER ANN KELNHOFER, also known as Jennifer Ann Gurien, JOSHUA A. KELNHOFER, JEFFREY P. KYER, and others known and unknown to the Grand Jury, did combine, conspire, confederate and agree to knowingly and intentionally distribute 5 grams or more of methamphetamine (actual) and 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846.

COUNT TWO

The Grand Jury further charges that on or about June 2, 2020, in the Eastern District of Tennessee, the defendant, JENNIFER ANN KELNHOFER, also known as Jennifer Ann Gurien, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in

violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

The Grand Jury further charges that on or about June 24, 2020, in the Eastern District of Tennessee, the defendant, JOHN EUGENE COLLINS, Jr., did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine and 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One, Two and Three of the Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and/or 846, the defendants, JOHN EUGENE COLLINS, Jr., JENNIFER ANN KELNHOFER, also known as Jennifer Ann Gurien, JOSHUA A. KELNHOFER, JEFFREY P. KYER, shall forfeit to the United States of America any property constituting or derived from any proceeds obtained directly or indirectly as a result of such offense, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of the offense.

3. If any of the property described above, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred, sold to, or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty,

the defendant shall forfeit any other property of the defendant up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p).


A TRUE BILL.



FOREPERSON OF THE GRAND JURY

J. DOUGLAS OVERBEY
United States Attorney

By:



Scott A. Winne
Assistant U.S. Attorney